

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK)
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
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Shauna Deluca, Esq. (SD-8248)

In Re:

James O. Bulger

aka James Ostern Bulger,

Debtor.

Case No.: 19-20601-VFP

Chapter: 7

Hearing Date: July 16, 2019

Judge: Vincent F. Papalia

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:

July 16, 2019 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> James O. Bulger 142 Park Place Irvington, NJ 07111	<i>Debtor's Attorney-</i> Harvey I. Marcus Harvey I. Marcus, Attorney 250 Pehle Avenue Suite 200 Saddle Brook, NJ 07663	<i>Trustee-</i> Eric Raymond Perkins Eric R. Perkins, Chapter 7 Trustee 354 Eisenhower Parkway Suite 1500 Livingston, NJ 07039	<i>U.S. Trustee-</i> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
<i>Co-Debtor-</i> Gwendolyn L. Bulger 142 Park Place Irvington, NJ 07111			

PLEASE TAKE NOTICE that on July 16, 2019, at 10:00 a.m., or as soon thereafter as
counsel may be heard, RAS Citron, LLC, attorneys for HSBC Bank USA, National Association

19-20601-VFP
19-354211
Notice of Motion

as Trustee for Ellington Loan Acquisition Trust 2007-1, Mortgage Pass-Through Certificates, Series 2007-1, the within creditor ("Creditor"), shall move before the Honorable Judge Vincent F. Papalia, United States Bankruptcy Judge, at 50 Walnut Street, Newark, NJ 07102, Courtroom 3B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Martin Luther King, Jr. Federal Building 50 Walnut Street, Newark, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: June 20, 2019

RAS Citron, LLC
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By: /s/ Shauna Deluca
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